RFP-1325.02 (Rev. 2/96)
Previously RF-46522

CORRES. CONTROL
INCOMING LTR NO.
21554RF96

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DATE

ACTION

DIST.	LTR	ENC
ALLEN, R.C.		
BENSUSSEN, S.J.		
BUHL, T.R.		
CARD, R.G.		
EVANS, B.L.		
FERRERA, D.W.		
FINNEY, M.J.		
GEIS, J.A.		
GILLISON, W.R.		
GLOVER, W.S.		
HARROUN, W.P.		
HEDAHL, T.G.		
HERRING, C.L.		
HILL, J.A.		
KELL, R.E.		
KELLY, G.M.		
MANI, V.		
MARTINEZ, L.A.		
McANALLY, J.L.		
McGOVERN, L.J.		
McKIBBIN, J.G.		
NORTH, K.		
OGG, R.N.		
PP[illegible]S, F.J.	X	
SAN[illegible]N, N.B.		
SPEARS, M.S.		
TUOR, N.R.		
VOORHEIS, G.M.		
WAITE, D.A.		
Nielsen, A.	X	
Schmuck, J.	X	

CORRES. CONTROL	X	X
ADMN RECORD/080		
PATS/T130G		

Reviewed for Addressee
Corres. Control RFP
7/96

LTR #

DOE ORDER # 5400.

Department of Energy

ROCKY FLATS FIELD OFFICE
P.O. BOX 928
GOLDEN, COLORADO 80402-0928

2 DEC 96 [illegible]

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NOV 25 [illegible]

96-DOE-03066

Mr. Tim Rehder
U.S. Environmental Protection Agency, Region VIII
ATTN: Rocky Flats Project Manager, 8HWM-RI
999 18th Street, Suite 500, 8HWM-FF
Denver, CO 80202-2405

Mr. Carl Spreng
Hazardous Waste Control Program
Colorado Department of Public Health and Environment
4300 Cherry Creek Drive South
Denver, Colorado 80222-1530

Gentlemen:

The U.S. Department of Energy/Rocky Flats Field Office (DOE/RFFO) is sending this correspondence to provide a summary of the current operational framework for the Present Landfill Passive Seep Interception and Treatment System. DOE is providing this detail to clarify the Proposed Action Memorandum (PAM) and allow all stakeholders to understand the framework to which operations are being performed. This will eliminate confusion as to the operational framework, memorialize the variety of verbal agreements, and provide a more auditable regulatory basis.

We have attached two documents for your information. The first is titled, "Present Landfill Passive Seep Interception and Treatment System Operational Framework," and the second is titled, "OU 7 Passive Seep Interception and Treatment Sampling and Analysis Plan." Unless concerns are voiced, operation of the system will continue in accordance with this framework and sampling and analysis plan.

If you have any questions, please contact Norma I. Castaneda at 966-4226

Sincerely,

Gail S. Hill

Gail Hill, Acting Group [illegible]
Regulatory Liaison Group

Enclosures

PRESENT LANDFILL PASSIVE SEEP INTERCEPTION AND TREATMENT SYSTEM OPERATIONAL FRAMEWORK

Purpose

The Modified Proposed Action Memorandum for Passive Seep Interception and Treatment (the PAM), dated March, 1996, stated that:

> "(t)he overall objective of the interception system is to eliminate, to the extent practicable, discharge of F039-listed waste contained in the seep water to a surface-water body."

Additionally, the PAM requires that:

> "(c)ompliance with potential applicable or relevant and appropriate requirements for seep water will be addressed, to the extent necessary, to protect human health and the environment through interception and treatment of the seep to reduce concentrations of volatile and semi-volatile organic compounds."

Consistent with that statement of objective, this Operational Framework is intended to summarize operational practices and to improve compliance and auditability. The operational framework will:

- present specific performance objectives (i.e. chemical-specific ARARs);
- clarify sampling requirements;
- document inspection practices;
- document conditions for bypass and associated notification;
- document carbon change-out practices;
- outline waste management practices; and
- address project reporting.

Performance Objectives

The original PAM (July, 1995) and Revision 1 (March, 1996) contain lists of *potential* ARARs and TBCs. It is necessary to refine the ARARs so that specific performance objects are identified in a manner that is consistent with Rocky Flats Cleanup Agreement (RFCA).

Table 1 presents the performance objectives for the system. The constituents included in the table are those volatile and semi-volatile constituents identified in the revised PAM for which RFCA Table 1 Surface Water Action Level and Standards are available for Segment 4a and 4b

Metals are not being included as part of the performance objectives. This is appropriate for two reasons. First, volatile and semi-volatile contaminants are the only leachate constituents treated in the system. The metal constituents have only limited affinity for the activated carbon. Second, metals have extremely high concentrations in both Rocky Flats groundwater and seep background samples. When these reasons are combined, surface water quality standards for metals are neither applicable or relevant or appropriate as measures of system performance.

Sampling Requirements

Complete detail on sampling requirements is provided in the accompanying OU7 Passive [illegible] Interception and Treatment System Sampling and Analysis Plan (SAP). The SAP [illegible] information on sampling [illegible] procedures, data quality objectives, [illegible] evaluation of analytical [illegible]. As noted above, the analyses are [illegible] volatile contaminants.

Table 1

Present Landfill Passive Seep Interception and Treatment System Performance Objectives

Constituent	RFCA Segment 4a and 4b Standards, ug/l
VOLATILES	
1,2-Dichloroethene	70
Benzene	1
Chloromethane	5.7
Ethylbenzene	680
Methylene chloride	5.0
Tetrachloroethene	0.8 (PQL=1)[1]
Toluene	1,000
Xylenes (total)	10,000
Trichloroethene	2.7
Vinyl Chloride	2
SEMI-VOLATILES	
2,4-Dimethylphenol	540
Acenapthene	520
bis(2-ethylhexyl)phthalate	1.8 (PQL = 6)[1]
Butyl benzyl phthalate	3,000
Diethyl phthalate	23,000
Di-n-butyl phthalate	2.7 (PQL = 10)[1]
Fluorene	1300
Napthalene	620
Pheneanthrene	0.0028 (PQL = 10)
Phenol	2,560

[1]Consistent with the *Rocky Flats Environmental Technology Site Action Levels and Standards Framework for Surface Water, Groundwater, and Soils*, July 19, 1996, Table 1, footnote (a), "(w)henever the practical quantitation limit for a pollutant is higher (less stringent) than a standard or action level, the PQL shall be used as the compliance measure."

Inspection

Daily inspections will be conducted during start-up and optimization. A less intensive inspection schedule will be implemented once a competent, steady-state operation can be maintained. Once implemented, specific conditions (i.e., storm events) will trigger additional inspection.

Bypass

Consistent with the prior verbal agreement, influent is allowed to bypass the treatment system during periods of high seep flow and during maintenance activities. A description of the bypass is provided in Section 2.0 of the SAP. The Environmental Protection Agency will be verbally notified in instances where bypass continues longer than 72 hours. Other shorter periods of by-pass will be included in the quarterly operational report.

Carbon Change-Out

Carbon will be removed from service when the concentration of any volatile and semi-volatile constituent listed in Table 1 exceeds the corresponding Segment 4a and 4b standard. Change-out will be accomplished after effluent sampling data is received from the laboratory.

Waste Management

Unless it is determined that the leachate does not "contain" hazardous waste, the Resource Conservation and Recovery Act (RCRA) F039 waste code is applicable to the spent filter socks and spent carbon due to the origin of the leachate. As a result, the spent filter socks and carbon must be managed in substantive compliance with RCRA requirements while located at the treatment system location. To accomplish substantive compliance, the spent filter socks and carbon will be properly containerized. Because the treatment system is located in the buffer zone, permit waivers are available and compliance with administrative permit requirements is not necessary.

Once the spent filters and carbon are taken to permitted RCRA storage units in the Industrial Area, the absence of permit waivers in the Industrial Area requires full substantive *and* administrative compliance.

Any additional analysis that may be required for either: 1) return and disposal of the filter socks and spent carbon as a Comprehensive Environmental Response, Compensation and Recovery Act (CERCLA) waste in the Present Landfill, or 2) off-site disposal as a RCRA waste will be performed in conjunction with the final disposition.

Reporting

Operational status and sample data will be documented and incorporated in the Quarterly Report for the Consolidated Water Treatment Facility.